

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Alejandro Benitez-Ramirez PRINCIPAL
A202 074 160 YOB: 1982
the United Mexican States

United States District Court
Southern District of Texas
FILED

MAR - 7 2015

CRIMINAL COMPLAINT

Case Number:

M-15-354 -M

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 6, 2015 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Miguel Angel Trujillo-Tellez and Mario Hernandez-Reyes, citizens and nationals of the United Mexican States, along with thirteen (13) other undocumented aliens, for a total of fifteen (15), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Roma, Texas to the point of arrest near Roma, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On March 6, 2015, at approximately 8:15 a.m., while monitoring Aerostat 5, Agent F. Lopez observed a black Ford pickup truck parked at a salon south of Nix Street in Roma, Texas. Agent Lopez observed several subjects laying in the bed of the truck attempting to conceal themselves and then relayed the information to agents in the area.

Agent V. Bustamante responded and observed a black Ford F-150 matching the description of the vehicle Alpha 5 described. The agent pulled in behind the truck and followed at a safe distance while Aerostat confirmed that the truck was the same vehicle in which the subjects were loaded into. After the vehicle was confirmed, Agent Bustamante conducted a vehicle stop on Utica Street in Roma, Texas to determine alienage of the individuals in the bed of the truck. The driver and all the passengers remained in the vehicle and as the agent approached the bed of the vehicle seven individuals were seen laying down in the bed of the Ford F-150.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Sworn to before me and subscribed in my presence,

March 07, 2015

Date

Dorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial Officer

Jeremiah J. Abrego Senior Patrol Agent
Printed Name of Complainant

at McAllen, Texas
City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-354 -M

RE: Alejandro Benitez-Ramirez

A202 074 160

CONTINUATION:

The driver, BENITEZ-Ramirez, Alejandro, and all passengers admitted to being in the United States illegally without the proper documentation to remain in the United States. After questioning, the driver and passengers were transported to the Rio Grande City Station for further processing.

Principal's Statement:

At the station, BENITEZ-Ramirez, Alejandro was read his Miranda Rights and was willing to provide a statement without the presence of an attorney.

Alejandro BENITEZ-Ramirez, a Lawfully Admitted Permanent Resident from Mexico, stated he was contacted by an acquaintance called "Tite" and asked BENITEZ-Ramirez to pick-up and transport Undocumented Aliens in Roma, Texas. BENITEZ-Ramirez agreed and was going to be paid 80.00 US Dollars per alien. Tite did not state how many people BENITEZ-Ramirez was to pick up. Tite informed BENITEZ-Ramirez that he was going to be contacted by "Pechuga" then next day. Pechuga contacted BENITEZ-Ramirez the next day via cell phone on March 6, 2015 to provide instructions. Pechuga instructed BENITEZ-Ramirez to drive south past the Citizen's State Bank in Roma, Texas and to park just past the stop sign. Once BENITEZ-Ramirez parked, the UDAs began to enter the cab and bed of the truck. Shortly after departing the area, BENITEZ-Ramirez was pulled over by a Rio Grande City Border Patrol Agent. BENITEZ-Ramirez stated that he did not receive any instructions as to where to transport the UDAs to, but he did know he was going to a house in Roma, Texas. BENITEZ-Ramirez was to contact Pechuga to receive directions to the house.

MATERIAL WITNESSES STATEMENTS:

Once at the Border Patrol Station, both of the material witnesses were advised of their Miranda Rights and provided a statement without the presence of an attorney.

MATERIAL WITNESS STATEMENT #1:

Miguel Angel Trujillo-Tellez, a citizen of Mexico, stated he made his arrangements with an unknown subject in Mexico and was to pay 3,000 U.S dollars to be smuggled into the United States. Subject stated that he arrived to Miguel Aleman with a friend and was taken to a hotel where they would stay until the next day. Subject stated that the next day someone picked them up and took them to the river. At the river subject stated that he met up with 14 other people. Subject furthermore stated that he crossed the river on foot and was guided by one guide that told the group to continue walking until we arrive to the road. Subject stated the guide told him some one was going to be waiting for him when he arrived to the road. Subject also stated he saw a black extended cab truck driving towards him and he got in it.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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CONTINUATION:

MATERIAL WITNESS STATEMENT #2:

Mario Hernandez-Reyes, citizen of Mexico, stated he made arrangements to be smuggled into the United States with an unknown individual in Miguel Aleman and was to pay 5,000 U.S Dollar. Subject stated he was taken to the river where a group was waiting and would later cross into the United States. Subject stated a total of 16 individuals crossed the Rio Grande River including the guide and walked for about 8 minutes until arriving to the location where a truck was waiting for the group. Subject stated he was told to get in to that truck. Subject described the truck as a black pickup truck. Subject also stated he laid down on the rear seat floor of the truck without the ability to secure himself with a safety belt. Subject stated he cannot describe the driver because there was too many people in the truck but did state the driver was a male..